

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA		
v.		No. 3:22-CR-00327
		JUDGE TRAUGER
[1] CHESTER GALLAGHER		
[2] HEATHER IDONI		
[3] CALVIN ZASTROW		
[4] COLEMAN BOYD		
[6] PAUL VAUGHN		
[7] DENNIS GREEN		

MOTION REQUESTING LEAVE TO FILE SEALED DOCUMENT

Comes now the above listed Defendants and hereby request leave of Court to file a sealed Exhibit in support their Reply to the Doe Witnesses' Response to Defendants' Motion to Reconsider. Specifically, the attached document should be filed under seal because it contains a public filing that contains the real name of one of the Jane Doe witnesses whom the Court has previously ruled could testify under a substitute name; in light of the Court's current mandate that the identities of the Jane Does remain confidential this Exhibit should be filed under seal (DE 470).

The sealed Exhibit will be served on counsel for the Jane Does, the Government and the above listed Defendants via email.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following by the EF/CME electronic filing system:

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This the 15th day of December 2023.

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